

TRUJILLO RODRIGUEZ & RICHARDS, LLC

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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

PATRICK BRADY <i>et al.</i> ,	:	
	:	
Plaintiffs,	:	Civil Action No. 02-2917 (JEI)
	:	
v.	:	
	:	
AIR LINE PILOTS ASSOCIATION,	:	
	:	
Defendant.	:	
	:	

NOTICE OF MOTION FOR SANCTIONS PURSUANT TO RULE 11

TO: Steve Fram
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PLEASE TAKE NOTICE that on Monday, October 3, 2011, or so soon thereafter as counsel may be heard, the undersigned attorneys for Plaintiffs shall move before the United States District Court, District of New Jersey, Mitchell H. Cohen U.S. Courthouse, One John F. Gerry Plaza, Fourth and Cooper Streets, Camden, New Jersey, for an Order granting Plaintiffs' Motion for Sanctions Pursuant to Rule 11 of the Federal Rules of Civil Procedure.

Plaintiffs will rely upon the enclosed Memorandum and Declaration of Nicole M. Acchione.

A proposed form of Order is enclosed.

Oral argument is requested if opposed.

Dated: September 6, 2011

Respectfully submitted,

TRUJILLO RODRIGUEZ & RICHARDS, LLC

By: s/ Lisa J. Rodriguez

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